

# **EXHIBIT 2**

**From:** Adriana Riviere-Badell  
**Sent:** Tuesday, November 05, 2019 12:17 PM  
**To:** 'David@SpecialMaster.Law'  
**Cc:** xALLDEFENDANTS-MDL2804-Service@arnoldporter.com;  
'mdl2804discovery@motleyrice.com'  
**Subject:** MDL 2804 - PBMs' Submission regarding Scope of Track Two Discovery  
**Attachments:** 2019 09 27 PBM Defendants submission re CT2 discovery.pdf

Dear Special Master Cohen,

We write for the PBM defendants. You asked other defendants to respond by today to plaintiffs' position on the temporal scope of discovery. Plaintiffs' emails did not address PBMs, nor did you ask for the PBMs to respond. And in any event, we were not even served with discovery until last night.

In light of the above, and because PBM discovery is new to this MDL and different in kind than discovery from manufacturers, distributors and pharmacies, we ask for a separate schedule to address whether, when and how PBM discovery should proceed. We propose a conference, where we can educate you on the PBM issues, as a good first step.

In the meantime, attached is the letter we previously submitted to you on PBM discovery.

Sincerely,

Adriana

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